

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

Hearing Date and Time:

May 16, 2023 at 11:30 am.

**DEBTOR'S OBJECTION TO THE OFFICIAL COMMITTEE
OF TALC CLAIMANTS' MOTION FOR ENTRY OF PROTECTIVE ORDER**

LTL Management LLC, the debtor in the above-captioned case (the "Debtor"), files this objection to the *Motion for Entry of Protective Order* [Dkt. 439] (the "Motion") filed by the Official Committee of Talc Claimants (the "TCC").

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

OBJECTION

In support of the Debtor's objection to the Motion, the Debtor refers to and incorporates by reference the arguments and authorities it cites in *Debtor's Cross-Motion for Protective Order* filed contemporaneously herewith [Dkt. 491].

CONCLUSION

The Debtor respectfully requests that the Court deny the Motion and grant such other and further relief to the Debtor as the Court deems just and proper.

Dated: May 11, 2023

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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